

Exhibit A



Deposition of
Thomas Wells

Date: March 25, 2020

Case: IN RE ASBESTOS LITIGATION, Consolidated Cases:
Thomas Wells v. BNSF Railway Company, et al.

No. AC 17-0694

Court Reporter: Susan L. Law, CCR, CSR

Paszkiewicz Court Reporting
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IN THE ASBESTOS CLAIMS COURT FOR THE STATE OF MONTANA
IN RE ASBESTOS LITIGATION,
Consolidated Cases

THOMAS WELLS,)	
)	
Plaintiff,)	
)	Cause No. AC17-0694
v.)	
)	
BNSF RAILWAY COMPANY,)	
et al.,)	
)	
Defendants.)	

VIDEOTAPED TELEPHONIC PERPETUATION DEPOSITION OF
THOMAS WELLS
Taken on Behalf of the Plaintiff
March 25, 2020

Susan L. Law, CCR, CSR

Thomas Wells
March 25, 2020

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1	INDEX	1	APPEARING TELEPHONICALLY: The Defendant,
2	Page	2	State of Montana, was represented by Dale Cockrell,
3	Examination by MS. MARIMAN: 5	3	Esq., of the law firm of Moore, Cockrell, Goicoechea &
4	Examination by MR. DUERK: 36	4	Johnson, 145 Commons Loop, Suite 200, Kalispell,
5	Examination by MR. HUEY: 76	5	Montana 59901.
6	Further Examination by MS. MARIMAN: 79	6	ALSO PRESENT TELEPHONICALLY:
7	EXHIBITS	7	Jackson Wells
8	Exhibit No. 1, Residential History 80	8	Sean Wells
9	Exhibit No. 2, Work History 80	9	Tod Lehecka
10	Exhibit No. 3, Residential Maps 80	10	The deposition was videotaped by Ali Wills,
11	Exhibit No. 4, Notated Pictures 80	11	in association with Paszkiewicz Court Reporting, 26
12	Exhibit No. 5, Address History 80	12	Ginger Park Parkway, Glen Carbon, Illinois 62034.
13	Exhibit No. 6, Work History 80	13	
14	(The original exhibits were retained by the court	14	
15	reporter and attached to Ms. Mariman's transcript.)	15	
16		16	
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1	IN THE ASBESTOS CLAIMS COURT FOR THE STATE OF MONTANA	1	IT IS HEREBY STIPULATED AND AGREED by and
2	IN RE ASBESTOS LITIGATION,	2	between counsel for the parties that this deposition
3	Consolidated Cases	3	may be taken by Susan L. Law, Certified Shorthand
4	THOMAS WELLS,)	4	Reporter and Certified Court Reporter, and afterwards
5	Plaintiff,)	5	transcribed into print and that signature by the
6) Cause No. AC17-0694	6	witness is not waived.
7	v.)	7	VIDEO TECHNICIAN: We are now on the
8	BNSF RAILWAY COMPANY,)	8	record. This is the videotaped deposition of Thomas
9	et al.,)	9	E. Wells. Today's date is March 25, 2020. The time
10	Defendants.)	10	is 2:04 p.m. Mountain Time.
11	VIDEOTAPED TELEPHONIC PERPETUATION	11	The attorneys present will be indicated on
12	DEPOSITION OF THOMAS WELLS, produced, sworn and	12	the stenographic record. The court reporter will now
13	examined on behalf of the Plaintiff, the 25th day of	13	swear in the witness.
14	March, 2020, at the offices of Paszkiewicz Court	14	O-O-O
15	Reporting, 26 Ginger Creek Parkway, Glen Carbon,	15	THOMAS WELLS,
16	Illinois 62034, before Susan L. Law, Certified	16	of lawful age, being produced, sworn and examined on
17	Shorthand Reporter and Certified Court Reporter.	17	behalf of the Plaintiff, and after responding "I do"
18	APPEARANCES	18	to the oath administered by the court reporter,
19	APPEARING TELEPHONICALLY: The Plaintiff was	19	deposes and says:
20	represented by Jennifer Mariman, Esq., of the law firm	20	*****
21	of McGarvey, Heberling, Sullivan & Lacey, 345 First	21	EXAMINATION BY MS. MARIMAN:
22	Avenue East, Kalispell, Montana 59901.	22	Q. Good afternoon, Tom.
23	APPEARING TELEPHONICALLY: The Defendant,	23	A. Good afternoon.
24	Robinson Insulation, was represented by Nathan Huey,	24	Q. Can you hear me okay?
25	Esq., of the law firm of Gordon Rees Scully &	25	A. Yes.

2 (Pages 2 to 5)

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<p style="text-align: right;">Page 6</p> <p>1 Q. Good. Tom, would you please introduce 2 yourself to the jury? 3 A. Well, my name is Tom Wells. I'm 65 years 4 old. I live in LaConner, Washington. I recently 5 moved there after living in LaConner and Mount Vernon 6 over the past 30 or some years. Worked in education, 7 agriculture, and that's generally about it. 8 Q. All right. Tom, I understand you're -- I 9 understand that you're in pain and managing that pain 10 with medications. Does that pain or the medications 11 affect your ability to answer my questions truthfully 12 and accurately? 13 A. Possibly. 14 Q. Can you understand my questions? 15 A. Does my pain inner-fect -- affect my 16 ability to function? 17 Q. No, that's not my question, Tom. Let me 18 try that again for you. Okay? 19 Does your pain or the medications you're 20 taking affect your ability to answer questions 21 truthfully and accurately? 22 A. No. 23 Q. Can you think of anything that will affect 24 your ability to answer questions truthfully and 25 accurately?</p>	<p style="text-align: right;">Page 8</p> <p>1 A. 1978, the fall. 2 Q. And the rest of the time you were married 3 what was her general occupation? 4 A. She was just getting started -- or actually 5 hadn't quite started at Pike -- Pike -- Pike time 6 teaching career yet, part-time. 7 Q. And once she started that career, what did 8 she teach? 9 A. She taught a variety of classes, including 10 lower elementary and library. 11 Q. I understand you are now divorced; is that 12 correct? 13 A. Correct. 14 Q. And when did you get divorced? 15 A. We got divorced in November -- no. We got 16 divorced in February of 2014. 17 Q. In the records you provided to us we have 18 July 20, 2015. Does that refresh your recollection? 19 A. Yes. 20 Q. Okay. Is that when you got divorced or 21 finalized the divorce? 22 A. I believe so. 23 Q. I understand Lucy is now institutionalized 24 with serious health issues; is that correct? 25 A. Yes.</p>
<p style="text-align: right;">Page 7</p> <p>1 A. No. 2 Q. Tom, how old are you? 3 A. I am 65. 4 Q. Where were you born? 5 A. Teaneck, New Jersey. 6 Q. And where were you raised? 7 A. Well, I was raised through age 14 in New 8 Jersey, age 18 in Southern California, and age 22, I 9 guess, through college in Missoula. Well, actually it 10 was in the college years, a bit longer than that. 11 That was Missoula, Montana. 12 Q. Okay. And the -- what did your mother and 13 father do for a living? 14 A. My father was an airline pilot for United 15 Airlines. My mother started as a stewardess at the 16 same time, and then they met, got married, at which 17 time she retired. 18 Q. Did she become a stay-at-home mom at that 19 point? 20 A. Yes. 21 Q. And, Tom, were you ever married? 22 A. Yes. 23 Q. To whom? 24 A. Lucille Wells. 25 Q. When did you get married?</p>	<p style="text-align: right;">Page 9</p> <p>1 Q. Did you and Lucy have any children? 2 A. Yes. 3 Q. Who did you have? 4 A. Jackson, age 32 now, and Sean, age 29. 5 Q. And those are your two sons; correct? 6 A. Correct. 7 Q. Could you explain to the jury very briefly 8 your education? 9 A. Yeah. I got a bachelor of arts in 10 geometry -- excuse me, geography in, I believe it was, 11 '78 and then went on and did some overseas teaching 12 in -- oh, wait a second. I taught in the Peace Corps. 13 Went in the Peace Corps in '79 while Lucy worked a 14 little bit longer to get her library certificate. 15 Then we went in the Peace Corps, and so that was two 16 years out of the country in South Korea. Then we came 17 back and I decided that teaching-overseas life looked 18 pretty nice. So I went back and worked some for the 19 forest service in '81 and Lucy continued working on a 20 library degree and education certificate. 21 Q. Did you get a masters of education at some 22 time? 23 A. I did, yes. 24 Q. And where did you get that from? 25 A. Western Washington University.</p>

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<p style="text-align: right;">Page 10</p> <p>1 Q. And you previously provided us a date of 2 1994 for that. Does that sound correct? 3 A. I'm guessing, yeah. 4 Q. Are you presently retired? 5 A. Yes. 6 Q. And you're retired from being a teacher; is 7 that correct? 8 A. Correct. 9 Q. What subjects did you teach? 10 A. I taught math and science, middle school. 11 Q. And did you teach for a total of 12 approximately 31 years? 13 A. Yes. 14 Q. Let's talk about the places you've lived 15 and worked. I have sent you and all defense counsel a 16 document labeled Exhibit 1, which is a list of all the 17 addresses you've lived at, and you helped us in 18 preparing Exhibit 1 and I believe you have it in front 19 of you as well. 20 A. Right. 21 Q. Is this history labeled as Exhibit 1 22 truthful and accurate? 23 A. Well -- 24 OFF-CAMERA SPEAKER: (Unintelligible.) 25 BY MS. MARIMAN:</p>	<p style="text-align: right;">Page 12</p> <p>1 then Columbia, that's correct? 2 BY MS. MARIMAN: 3 Q. Okay. We'll make that Exhibit 1 to your 4 deposition. 5 As far as where you've worked, I've sent 6 you and defense counsel a document labeled Exhibit 2 7 across the top, which is a list of your work history 8 which we prepared -- 9 A. Yeah. 10 Q. -- with your help. 11 A. Yep. 12 Q. Is this work history labeled as Exhibit 2 13 truthful and accurate? 14 A. Yep. 15 MS. MARIMAN: Okay. We're going to make 16 that Exhibit 2 to Tom's deposition. 17 BY MS. MARIMAN: 18 Q. Now, I've sent you and all defense counsel 19 a document labeled Exhibit 3, which are maps you 20 helped us create that depict where you lived and 21 worked. 22 A. Right. 23 Q. Are the maps labeled as Exhibit 3 truthful 24 and accurate? 25 A. Yes.</p>
<p style="text-align: right;">Page 11</p> <p>1 Q. No, this is Exhibit 1. This is -- let me 2 show the camera. Here you go. Can you guys see that 3 one? 4 A. Well, I can see it better in -- held in 5 front of me. 6 Q. I believe it says Exhibit 1 at the top. 7 OFF-CAMERA SPEAKER: Right there are the 8 addresses. 9 A. Missoula, Highway 2, Libby. 10 OFF-CAMERA SPEAKER: (Unintelligible.) 11 A. Sylvanite, Highway 2 going to Libby. Okay. 12 BY MS. MARIMAN: 13 Q. And, Tom, I just want to confirm. Are you 14 looking at the document that is typewritten? 15 A. Yes. 16 Q. And on the top -- 17 A. Yes. 18 Q. -- it says "In Re: Tom Wells, Exhibit 1" 19 in the middle. 20 A. Yeah. 21 Q. Okay. So this Exhibit 1, is it truthful 22 and accurate? 23 OFF-CAMERA SPEAKER: Yeah. 24 A. Yeah. I was just thinking. There it says 25 I went to Colombia before Guatemala. No. Guatemala,</p>	<p style="text-align: right;">Page 13</p> <p>1 Q. And we'll make that Exhibit 3 to your 2 deposition? 3 A. Okay. 4 Q. And then finally -- oh, I'm sorry, Tom. 5 Did you have a question? 6 A. No. No, I was just verifying the maps. 7 Q. Okay. And then finally, I sent you and all 8 of defense counsel a document labeled Exhibit 4, which 9 are photos you took during the time you were working 10 for the forest service in Lincoln County, and at the 11 bottom there's some notations there as well. I 12 understand that what's in quotation marks is what was 13 printed on the back of the slides you took; is that 14 correct? 15 A. Yeah. 16 Q. And then the notations are your description 17 of the photo; is that correct? 18 A. Yeah. 19 Q. Okay. So are the photos a true and correct 20 copy of the photos you took? 21 A. Yeah, they're originals. 22 Q. Okay. And the notations that are on those 23 that -- that reflect what was written on the back of 24 the slides and your description of the -- of the 25 photo, are those true and accurate?</p>

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<p>1 A. Yeah.</p> <p>2 Q. Okay. Let's talk more about your time in</p> <p>3 Lincoln County, Montana. Okay?</p> <p>4 A. Okay.</p> <p>5 Q. Okay. So I understand you did seasonal</p> <p>6 work for the forest service while you were in college;</p> <p>7 is that correct?</p> <p>8 A. Yeah. Yes.</p> <p>9 Q. And you've told me that Missoula was on a</p> <p>10 quarter system; is that correct?</p> <p>11 A. I think so back then, yeah.</p> <p>12 Q. Can you tell the jury what years you worked</p> <p>13 for the forest service in Lincoln County, Montana?</p> <p>14 A. Yeah. Summer '76, '77, '78.</p> <p>15 Q. Okay. And the -- when you say summer of</p> <p>16 '76, '77, '78, how many months -- which months were</p> <p>17 you in Lincoln County working for the forest service</p> <p>18 during those times?</p> <p>19 A. It would be July -- June, July, August,</p> <p>20 September, and most of November.</p> <p>21 Q. So June through most of November; is that</p> <p>22 correct?</p> <p>23 A. Yep.</p> <p>24 Q. Okay. And did you work for the forest</p> <p>25 service in 1981 as well?</p>	<p>1 Q. And how many hours a week would you work?</p> <p>2 A. Either 50 or 40.</p> <p>3 Q. And were you doing ten-hour days?</p> <p>4 A. Occasionally.</p> <p>5 Q. Did sometimes you work four tens Mondays</p> <p>6 through Thursday?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. When you were working for the forest</p> <p>9 service, where were you stationed out of?</p> <p>10 A. I think definitely some of the time at</p> <p>11 Libby. I'm not sure if we ever worked four tens out</p> <p>12 of Troy. So it was kind of a mix.</p> <p>13 Q. And did you ever go to the W.R. Grace Mine</p> <p>14 site?</p> <p>15 A. No.</p> <p>16 MR. COCKRELL: Objection. Form. That was</p> <p>17 Dale Cockrell for the State.</p> <p>18 MS. MARIMAN: Okay.</p> <p>19 BY MS. MARIMAN:</p> <p>20 Q. Tom, did your work ever take you anywhere</p> <p>21 other than Libby or Troy?</p> <p>22 A. Did my work -- work ever take me, like, up</p> <p>23 to the Sylvanite?</p> <p>24 Q. Yes.</p> <p>25 A. I worked up at the -- in the forest up</p>
Page 15	Page 17
<p>1 A. Yes.</p> <p>2 Q. What months did you work for the forest</p> <p>3 service in 1981?</p> <p>4 A. July or April -- or July or August or June.</p> <p>5 Q. And that was when you returned from the</p> <p>6 Peace Corps; is that right?</p> <p>7 A. Yeah.</p> <p>8 Q. Okay.</p> <p>9 A. Yeah, I had a W-2 in there.</p> <p>10 Q. Okay. What were you doing for the forest</p> <p>11 service?</p> <p>12 A. Surveying.</p> <p>13 Q. And what were you surveying?</p> <p>14 A. P lines, primary lines for logging roads.</p> <p>15 Q. And were you initially hired as a soils</p> <p>16 tech when they first hired you?</p> <p>17 A. Yes.</p> <p>18 Q. And then due to the demands of logging</p> <p>19 roads, et cetera, you were quickly trained as a</p> <p>20 surveyor; is that correct?</p> <p>21 A. Yeah. It seemed like aptitude for the job</p> <p>22 and not much demand in the soil technician area.</p> <p>23 Q. What days would you typically work?</p> <p>24 A. Either Monday through Friday or Monday</p> <p>25 through Thursday.</p>	<p>1 above, you know, the mining area.</p> <p>2 Q. Are you talking about the Yaak area?</p> <p>3 A. I'm talking about the national forest up on</p> <p>4 the Kootenai.</p> <p>5 Q. And are you talking about the Yaak,</p> <p>6 Y-A-A-K, area?</p> <p>7 A. Yes.</p> <p>8 Q. Okay.</p> <p>9 A. Yeah, I didn't do my work -- I didn't do my</p> <p>10 work right around the mine. I did it north -- I guess</p> <p>11 it would be north, northwest.</p> <p>12 Q. In the Yaak area?</p> <p>13 A. Yeah. If we had an old map, we could</p> <p>14 probably sort it right out.</p> <p>15 Q. And we have forest service maps and we can</p> <p>16 do that if needed in the future.</p> <p>17 So I want to ask you about 1976, the first</p> <p>18 summer you worked -- or the first summer and fall you</p> <p>19 worked for the forest service when you lived out at</p> <p>20 the Sylvanite bunkhouse. Is that where you lived?</p> <p>21 A. Yes.</p> <p>22 Q. And would you spend time in Libby when you</p> <p>23 weren't working?</p> <p>24 A. Sometimes, yeah.</p> <p>25 Q. What would you do?</p>

5 (Pages 14 to 17)

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<p style="text-align: right;">Page 18</p> <p>1 A. Oh, go to the bars, shop. 2 Q. Would you do any shopping -- oh, I'm sorry. 3 Go ahead. 4 Approximately how frequently do you think 5 you would go? 6 A. Between recreational activity and the 7 shopping, a couple times a week. 8 Q. Okay. Now, I want to ask you about 1977, 9 the next summer and fall when you worked for the 10 forest service when you lived off Highway 2 not far 11 from the drive-in theater. Who did you live with 12 there? 13 A. Three other guys. 14 Q. Do you remember any of their names? 15 A. No. I remember one had a Rock name called 16 Nick -- or Rock. Excuse me. He had a Rock -- he had 17 a nickname, Rock. 18 Q. Okay. And when you weren't at work, did 19 you spend time at your house in Libby or recreate in 20 Libby? You. 21 A. Yeah. 22 Q. What would you do in Libby? 23 A. Golf at a little golf course there. Do 24 some fishing. Once again, do some shopping. A little 25 bit of -- a little bit of garden recreational work.</p>	<p style="text-align: right;">Page 20</p> <p>1 A. Yep. 2 Q. Let's -- I want to ask you about 1978 when 3 you lived in a trailer next to the Libby rail yard. 4 Do you remember that? 5 A. Yes. 6 Q. Who did you live with? 7 A. My wife to be. 8 Q. And that's Lucy? 9 A. Yes. 10 Q. Did you spend -- when you weren't at work, 11 did you spend your time in Libby or at the house? 12 A. Yes. 13 Q. And what would you do when you were at the 14 house or when you were spending time in Libby? 15 A. Hang out. 16 Q. Were there any types of activities that you 17 liked to do? 18 A. Any what? 19 Q. Any activities that you liked to do when 20 you were living at your house in Libby in 1978? 21 A. Oh, just the regular stuff. We liked to go 22 swimming, you know, if we could find a swimming hole. 23 I think Lucy would come out and walk the golf course 24 with me occasionally. She didn't play. 25 Q. And did you walk anywhere from your house?</p>
<p style="text-align: right;">Page 19</p> <p>1 We didn't get very far with that. We weren't around 2 enough, it didn't seem, to be successful. 3 Q. And with the gardening, do you recall did 4 you put any soil amendments or fertilizer in them? 5 A. Yeah, we probably threw some fertilizer on 6 it. 7 Q. Okay. Do you know where you would have 8 gotten that fertilizer? 9 A. The hardware store. 10 Q. Okay. Do you -- did you also still go to 11 the local watering holes after work occasionally? 12 A. Oh, yeah. 13 Q. And the house that you lived in, did it 14 have air conditioning? 15 A. Not that I recall. I just remembered it 16 always being kind of -- kind of hot, dry, dusty. 17 Q. And did you keep the windows open because 18 it was hot? Was that yes? 19 A. Yes. 20 Q. And just to summarize, when you weren't at 21 work, you spent your time around the house or 22 recreating in Libby; is that correct? 23 A. Yeah. Finding swimming holes also. 24 Q. Okay. Okay. And that was in that 1977 25 timeframe we're talking about?</p>	<p style="text-align: right;">Page 21</p> <p>1 A. We'd walk into town. Look forward to -- 2 Q. How would you do that? 3 A. After work look forward to a nice stroll 4 into town and have a couple of cold ones at the end. 5 Q. And when you talk -- when you talk about 6 town, are you talking about Mineral Avenue in downtown 7 Libby where the Mint and VFW and Pastime were? 8 A. Yeah. Yep. 9 Q. How would you -- how would -- what route 10 would you take when you walked to town? 11 A. Routes. You just go straight out the door 12 and there's a -- just a straight street that ran right 13 to whatever that is, Main that has all the bars on it, 14 or we could go right along the track. 15 Q. And which route -- how -- how frequently 16 would you walk along the track? 17 A. Well, I think when it was breezy, it was 18 nicer along the track because there was a little bit 19 of air off the water and a little -- maybe a little 20 less particulate in the air. 21 Q. How many times per week do you think you 22 would walk along the track down to that Mineral Avenue 23 area? 24 A. A couple. 25 Q. And would you also walk down that way on</p>

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<p style="text-align: right;">Page 22</p> <p>1 the weekends as well?</p> <p>2 A. Yeah. I mean, often -- about half the time</p> <p>3 probably we left town on the weekends, especially if</p> <p>4 it was a four-day workweek just because we had a nice</p> <p>5 place over on Flathead Lake.</p> <p>6 Q. Okay. And what do you recall about the</p> <p>7 walk along the rail yard?</p> <p>8 A. The walk along the railroad?</p> <p>9 Q. Yeah. What do you recall about it?</p> <p>10 A. Yeah. I remember things drying up pretty</p> <p>11 good by August, and when you'd get walking -- walking</p> <p>12 down along the tracks, you'd get a lot of roughly,</p> <p>13 crinkly, wind-blowing kind of like little hurricane or</p> <p>14 something blowing through.</p> <p>15 Q. Okay. And --</p> <p>16 A. A lot of stuff stirred up.</p> <p>17 Q. And the trailer that you lived at, it was</p> <p>18 right next to the rail yard; is that correct?</p> <p>19 A. Yes.</p> <p>20 Q. Did it have air conditioning?</p> <p>21 A. The trailer? No.</p> <p>22 Q. Yes.</p> <p>23 A. I'm pretty sure not.</p> <p>24 Q. Would you keep your windows open?</p> <p>25 A. Yes. That's the way I remember it.</p>	<p style="text-align: right;">Page 24</p> <p>1 Q. What was it like when they stirred up dust?</p> <p>2 A. Yeah.</p> <p>3 Q. What was it like when they stirred up the</p> <p>4 dust?</p> <p>5 A. Well, it was a mess. It was dusty. You</p> <p>6 know, you'd wash the car and then pretty soon you have</p> <p>7 to wash it again.</p> <p>8 Q. What did it feel like in the trailer when</p> <p>9 one of those nonstop through trains went by?</p> <p>10 A. Rock and roll.</p> <p>11 Q. Did the trailer shake?</p> <p>12 A. Yes.</p> <p>13 Q. Now, when you were walking along the track,</p> <p>14 did you ever see black shiny flakes about the size of</p> <p>15 a pencil eraser on the ground?</p> <p>16 A. Yeah. I mean, just walking along, you tend</p> <p>17 to look down, especially when you're on a railroad</p> <p>18 track, and there's a lot of unsure footing. So, yeah,</p> <p>19 you would look down and see -- yeah, you would see</p> <p>20 some black stuff mixed in. Yep.</p> <p>21 Q. Did -- did you ever know what the railroad</p> <p>22 was actually shipping?</p> <p>23 A. No, I didn't.</p> <p>24 Q. Okay. Let's talk about what you did for</p> <p>25 recreation in 1978 when you were living at that</p>
<p style="text-align: right;">Page 23</p> <p>1 Q. Was the house dusty?</p> <p>2 A. Yeah.</p> <p>3 Q. And how would you clean the house?</p> <p>4 A. Towels and rags.</p> <p>5 Q. All right. And do you -- would you shake</p> <p>6 out blankets, if needed?</p> <p>7 A. Yeah.</p> <p>8 Q. Did you vacuum at all?</p> <p>9 A. Oh, yeah, probably would have vacuumed.</p> <p>10 Q. Let's talk about the rail yard itself. Was</p> <p>11 it dusty?</p> <p>12 A. Yes.</p> <p>13 Q. And did you ever see dust come off the rail</p> <p>14 yard?</p> <p>15 A. Yes.</p> <p>16 Q. Can you describe that?</p> <p>17 A. Well, if just the wind were blowing, a</p> <p>18 natural wind, or especially when another train went</p> <p>19 through at high speed, would make it quite a mess.</p> <p>20 Q. And can you -- can you describe -- you</p> <p>21 talked about a train going through. Are you talking</p> <p>22 about the nonstop trains that went through the Libby</p> <p>23 rail yard?</p> <p>24 A. Well, they would stir up more stuff for</p> <p>25 sure.</p>	<p style="text-align: right;">Page 25</p> <p>1 trailer next to the rail yard. What would you do for</p> <p>2 recreation?</p> <p>3 A. All right. Just hang around. We were</p> <p>4 working a lot, but we would also go out after work and</p> <p>5 look for cold -- cold beer to drink. We would -- if</p> <p>6 it were tolerable, we would just sit outside sometimes</p> <p>7 with friends and shoot the breeze. We might go walk</p> <p>8 the golf course. We might -- we might look for a</p> <p>9 swimming hole. That sort of stuff. Took a little</p> <p>10 summer stuff -- summertime Montana, young 20s stuff.</p> <p>11 Q. I understand. Did you ever go down to</p> <p>12 Libby Logger Days?</p> <p>13 A. Yeah.</p> <p>14 Q. And --</p> <p>15 A. Did it.</p> <p>16 Q. Do you recall how many times you went to</p> <p>17 Logger Days?</p> <p>18 A. Once or twice. I don't remember.</p> <p>19 Q. And was that located down by the rail yard</p> <p>20 as well?</p> <p>21 A. Yeah. I think it was a baseball field.</p> <p>22 Q. Okay. Did you compete in any activities?</p> <p>23 A. I was in the log roll one year where you</p> <p>24 grease up your legs, I think, and try to balance on a</p> <p>25 log going sideways.</p>

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<p style="text-align: right;">Page 26</p> <p>1 Q. Did you win or did you get rolled?</p> <p>2 A. I got rolled.</p> <p>3 Q. I want to ask you about 1981 when you</p> <p>4 returned from the Peace Corps and worked for the</p> <p>5 forest service one last quarter, and you had testified</p> <p>6 earlier you thought that was around July or August; is</p> <p>7 that correct?</p> <p>8 A. I think so, yeah.</p> <p>9 Q. I want to ask you about the house you lived</p> <p>10 in where Bull Lake Road intersected Highway 2 near</p> <p>11 Troy. Who did you live with?</p> <p>12 A. Oh, I lived with a kid from back east. He</p> <p>13 must have been going to forestry school at U of M.</p> <p>14 Q. Okay.</p> <p>15 A. I don't recall his name.</p> <p>16 Q. And when you were not at work, would you</p> <p>17 spend time in the Libby area as well?</p> <p>18 A. With this person?</p> <p>19 Q. No, just generally yourself. Would you</p> <p>20 spend time in the Libby area when you weren't at work?</p> <p>21 A. Yeah. I was married by then, and he was --</p> <p>22 he was working quite a bit. So most weekends in that</p> <p>23 stretch I went down to Missoula.</p> <p>24 Q. Did -- and would you ever go to Libby for</p> <p>25 shopping or a cold beer after work, by chance, in</p>	<p style="text-align: right;">Page 28</p> <p>1 have to say, proud of myself. I lived a healthy,</p> <p>2 pretty clean life, and I set my goals in my 30s to</p> <p>3 retire when I was 60 and have the ability to be</p> <p>4 physical, to be active, and I had felt that I had</p> <p>5 made -- made those achievements.</p> <p>6 Q. And in your family both of your parents</p> <p>7 have lived into their 90s; is that correct?</p> <p>8 A. Yes. Yes, my mom is still going at 95, and</p> <p>9 my dad passed away at 94.</p> <p>10 Q. So when making your retirement goals, were</p> <p>11 you trying to put yourself in a position of being</p> <p>12 healthy for a long retirement?</p> <p>13 A. Yes. They were healthy and active well</p> <p>14 into their 80s.</p> <p>15 Q. Can you tell the jury what some of your</p> <p>16 hobbies were before you got sick?</p> <p>17 A. Yeah. I did some mountain climbing, played</p> <p>18 lots of golf with my buddies. One of my favorite</p> <p>19 things to do. Oh, played -- skied. Skied a lot. So</p> <p>20 skiing in the winter, golfing in the summer, hiking,</p> <p>21 camping. Loved it all. Loved it all.</p> <p>22 Q. Did you like to run?</p> <p>23 A. Yes, I did. I ran a half marathon at 60 --</p> <p>24 well, right around 60, I guess.</p> <p>25 Q. So just a few years ago?</p>
<p style="text-align: right;">Page 27</p> <p>1 1981?</p> <p>2 A. Occasionally.</p> <p>3 Q. Okay. The house -- the house where you</p> <p>4 lived, did it have air conditioning?</p> <p>5 A. I doubt it, but actually it was a newer</p> <p>6 house. It may have.</p> <p>7 Q. Okay. Do you like to have your windows</p> <p>8 open?</p> <p>9 A. Huh?</p> <p>10 Q. Do you recall if you kept your windows</p> <p>11 open?</p> <p>12 A. Well, during the summer, certainly.</p> <p>13 Q. Okay. And --</p> <p>14 A. We closed them up at night maybe.</p> <p>15 Q. And I want to circle back to one thing.</p> <p>16 During the course of either your work or any of your</p> <p>17 activities, did you ever have an occasion to go out to</p> <p>18 the W.R. Grace Mine?</p> <p>19 A. Nope.</p> <p>20 Q. Okay. Tom, I understand you've been</p> <p>21 diagnosed with mesothelioma; is that correct?</p> <p>22 A. That's correct.</p> <p>23 Q. Before you got sick, can you tell the jury</p> <p>24 what your health was like?</p> <p>25 A. Yeah. My health was good. I was, if I</p>	<p style="text-align: right;">Page 29</p> <p>1 A. Yep.</p> <p>2 Q. And since then, did you -- did you -- have</p> <p>3 you been running in a competitive race within the last</p> <p>4 year or two?</p> <p>5 A. No. No. I raced it and made my goal of</p> <p>6 1:45, but that was -- that wasn't really pleasurable.</p> <p>7 It was a little bit more work.</p> <p>8 Q. That was at age -- at age 60 you did that?</p> <p>9 A. Somewhere right around 60.</p> <p>10 Q. Wow. Did you -- did you like to play</p> <p>11 volleyball?</p> <p>12 A. Loved it. I was playing in the rec</p> <p>13 volleyball until I was 63, and I would have continued</p> <p>14 except I had a couple of minor leg things going on. I</p> <p>15 was planning on going back.</p> <p>16 Q. How about basketball?</p> <p>17 A. Not so much basketball.</p> <p>18 Q. And what about pickleball?</p> <p>19 A. Took up pickleball the last two years.</p> <p>20 Really enjoyed it.</p> <p>21 Q. How about for those on the jury who might</p> <p>22 not know what pickleball is, can you tell them what it</p> <p>23 is?</p> <p>24 A. It's like a mini version of tennis. You</p> <p>25 use a racket, but you don't move around quite as much,</p>

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<p style="text-align: right;">Page 30</p> <p>1 but you get your --</p> <p>2 Q. Okay.</p> <p>3 A. -- you get your quickness tested.</p> <p>4 Q. Did you enjoy fishing?</p> <p>5 A. Fishing, yep. That was right on the list.</p> <p>6 Q. And is that --</p> <p>7 A. Salmon -- salmon, occasional fish to</p> <p>8 tropical waters.</p> <p>9 Q. How about any -- any digging for oysters or</p> <p>10 anything along the coast like that?</p> <p>11 A. Yep. Did lots of that because I took on a</p> <p>12 part-time job with a fellow who has an oyster/clam</p> <p>13 business. So we would work -- oh, during the harvest</p> <p>14 season and planting, we might work two or three days a</p> <p>15 week. Very strenuous work, but good physical work.</p> <p>16 Q. Okay.</p> <p>17 A. Loved it.</p> <p>18 Q. Can you tell the jury, to the best of your</p> <p>19 recollection, what exactly you've been diagnosed with?</p> <p>20 A. Yeah. Unfortunately, I've been dialed</p> <p>21 (sic) with a cancer that has no cure. So I, of</p> <p>22 course, looked at the possibilities for a cure, and</p> <p>23 the one remaining was a surgical removal of all</p> <p>24 affected parts and then just radiation and chemo</p> <p>25 maintenance, which after the first three chemo wasn't</p>	<p style="text-align: right;">Page 32</p> <p>1 related to a post-nasal drip. So we tested those</p> <p>2 things with -- with pills and sort of normal</p> <p>3 treatments.</p> <p>4 Well, I went off on a couple of long hiking</p> <p>5 trips at that point back in Southeastern Utah and</p> <p>6 Southern Nevada, and on one of those trips I got lost</p> <p>7 down in the desert, and a nine-hour day trip ended up</p> <p>8 to a two-hour overnight, unplanned journey, and I</p> <p>9 really physically deleted (sic) myself. The cough got</p> <p>10 way worse, and I turned around and went right back to</p> <p>11 Mount Vernon Hospital, and I said, "I got to get in</p> <p>12 right away," and she said okay, got me in, and they</p> <p>13 immediately said, "Oh, we need further x-rays. Let's</p> <p>14 see exactly what's going on here." And my primary</p> <p>15 care physician was convinced it was a form of</p> <p>16 pneumonia, but when the CT scan came in against</p> <p>17 contrast, they said, "No, this is mesothelioma," and</p> <p>18 they said, "You know, we don't know a whole lot up</p> <p>19 here -- about it up here, but here's what we think you</p> <p>20 need to do. Get a second opinion, although we can do</p> <p>21 everything up here that they can do down there."</p> <p>22 So I just kind of looked into -- I was</p> <p>23 pretty devastated, especially looked into the part</p> <p>24 where they thought I was beyond an operational</p> <p>25 treatment. So we ended up discussing both courses,</p>
<p style="text-align: right;">Page 31</p> <p>1 working, very painful, and they recommended that I</p> <p>2 really have no -- no future at this point. What I'm</p> <p>3 doing is prolonging the inevitable, and as long as I</p> <p>4 could holler the pain and tolerate -- tolerate the</p> <p>5 pain, then I was free to go on and continue this</p> <p>6 course, but the pain's becoming intolerable.</p> <p>7 Q. Tom, can you explain to the jury how your</p> <p>8 symptoms came about and when?</p> <p>9 A. Yeah. Well, starting last summer I</p> <p>10 developed a little bit of an ache across my back, and</p> <p>11 that would have been early September. I also had a</p> <p>12 foot problem, some soreness in my foot. Well, I</p> <p>13 assumed the pain in the foot was some sort of strain</p> <p>14 and it would wear off, and then the back problem</p> <p>15 related to the shoulder got worse instead of better.</p> <p>16 You know, I thought it was something that would just</p> <p>17 heal with time.</p> <p>18 So I went in to see the doc in September,</p> <p>19 and she said, "Well" -- oh, it was a cough also. At</p> <p>20 the same time with the -- with the shoulder aching, I</p> <p>21 developed a cough, a pretty serious one. It wouldn't</p> <p>22 go away. And so I went in to have the check -- the</p> <p>23 cough -- the cough checked, which led to a belief that</p> <p>24 there was a tie to the soreness back there, and so we</p> <p>25 looked into the cough being somehow sinus related or</p>	<p style="text-align: right;">Page 33</p> <p>1 the nonoperative and the operative, and they kind of</p> <p>2 told me up here that you're past -- you know, you're</p> <p>3 not going to get through it, and so I was kind of</p> <p>4 resigned to this course, but then I talked to some</p> <p>5 people up here who -- who steered me down the course</p> <p>6 of, hey, get a second opinion, you never know, and so</p> <p>7 I went down there and got a second opinion. And they</p> <p>8 held out a glimmer of hope that there might be some</p> <p>9 surgical option and that, you know, why not take a</p> <p>10 look. So I went down there for my next course, and</p> <p>11 they said, "Well, let us just see how this goes.</p> <p>12 We'll evaluate it. We'll come out with an evaluation</p> <p>13 and then we'll decide what to do."</p> <p>14 Well, they started with a -- "You know, we</p> <p>15 have an option here for -- for operation," and I said,</p> <p>16 "Okay. Well, I'd like to do that." So they got me</p> <p>17 all set up down there and then they did another</p> <p>18 evaluation, like, just two weeks after the second one</p> <p>19 because I was just so -- so sore and down and they</p> <p>20 agreed that -- that I was no longer a surgical patient</p> <p>21 and that it wasn't looking good. So they did a third</p> <p>22 one and did a full-on plasma chemo the way they were</p> <p>23 going to do and looked at that and said, "You know,</p> <p>24 well, what you're telling me now is, you know,</p> <p>25 you're -- you're on to palliative care treatment from</p>

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1 here on out and it's just going to be a matter of how
2 long it takes and that's up to you."
3 And things have really started to go
4 downhill since then. They cancelled the third chemo.
5 So right now I'm just at the will of the -- the
6 medicines, I guess.
7 Q. Can you -- can you tell the jury how the
8 diagnosis and your future is affecting you.
9 A. Definitely. I'm in -- I'm in great pain
10 and all I see is this getting worse and getting worse
11 for my relatives who are having to take every day out
12 of their life, their busy lives and their careers and
13 do that to indefinitely.
14 Q. Who's taking care of you right now, Tom?
15 A. My two sons and my best friend mainly.
16 Q. Have this and the medical bills caused you
17 financial stress?
18 A. Yes.
19 Q. Have you sold your house as a result of
20 that?
21 A. I have.
22 Q. Is there anything else you would like to
23 tell the jury, Tom?
24 A. No. Just that I have been placed in a
25 horrible spot here, and the best chance I see at

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1 here.
2 TELEPHONIC DEFENSE COUNSEL: Fine here.
3 A. Okay.
4 VIDEO TECHNICIAN: Okay. So we are going
5 off the record. It's --
6 TELEPHONIC DEFENSE COUNSEL: Hey Jin --
7 Jin, how about five to ten minutes?
8 MS. MARIMAN: That sounds good. You guys
9 just go ahead and sign back in when you're ready.
10 Okay?
11 VIDEO TECHNICIAN: Going off the record at
12 2:56 p.m.
13 (Break.)
14 VIDEO TECHNICIAN: Okay. It is 3:08 p.m.,
15 and we are back on record.
16 EXAMINATION BY MR. DUERK:
17 Q. Mr. Wells, my name is Adam Duerk. I'm an
18 attorney with Burlington Northern Santa Fe Railroad.
19 Can you hear me okay?
20 A. I can hear you just fine, Adam.
21 Q. All right. Thank you, Mr. Wells. If at
22 any time you need to take a break or ask for
23 clarification in any of the questions that I'm asking
24 you, would you please indicate that you'd like to do
25 so?

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1 release -- relieve for everybody is to just get it
2 over with. My pain, they're suffering. It's just not
3 something I want to try to play hero through because I
4 don't think there's a miracle waiting.
5 MS. MARIMAN: Tom, I want to thank you for
6 your time and I really wish I could have been there,
7 as I'm sure the defense counsel would have as well.
8 So for that --
9 A. Yeah.
10 MS. MARIMAN: -- we'll let some questions.
11 A. Well, I appreciate -- appreciate you making
12 an attempt to expedite this. It's tough.
13 OFF-CAMERA SPEAKER: You want to take a
14 little break in between? We can do that.
15 MS. MARIMAN: Tom, how are you feeling?
16 A. Yeah, we're thinking maybe take a short
17 break. Is that all right?
18 MS. MARIMAN: That would be fine. Yeah,
19 how long would you like, Tom?
20 A. Five minutes.
21 MS. MARIMAN: Is that good with everyone
22 else?
23 TELEPHONIC DEFENSE COUNSEL: Works here,
24 yes.
25 TELEPHONIC DEFENSE COUNSEL: It's fine

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1 A. Okay.
2 Q. Mr. Wells, is it fair for me to assume that
3 if you answer a question that I've asked, that you
4 understood it?
5 A. Yes.
6 Q. All right. Mr. Wells, we're here at your
7 preservation deposition today to try to make a clear
8 record about your testimony, and in order to do so,
9 rather than nodding your head affirmatively or shaking
10 your head to say no, we need to make an oral record.
11 Is that clear?
12 A. Okay.
13 Q. If we start to speak over one another, I'll
14 go ahead and stop and let you finish, but when we
15 speak over one another, that's very difficult for the
16 court reporter to take down. Understood?
17 A. Yes.
18 Q. All right.
19 A. Understood.
20 Q. Thank you. And again, it's not my intent
21 to play any word games or mind games with you as we
22 make this record. So if I ask a question that doesn't
23 make any sense, would you please stop me and ask me to
24 pose the question a different way rather than just
25 guessing at my meaning?

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<p style="text-align: right;">Page 38</p> <p>1 A. Yes.</p> <p>2 Q. All right. Thank you, Mr. Wells.</p> <p>3 A. You're welcome.</p> <p>4 Q. In terms of this case, we have four</p> <p>5 exhibits that we've used on the record. I'll be using</p> <p>6 just a few more today and I'll walk through those</p> <p>7 exhibits one by one. Okay?</p> <p>8 A. Okay.</p> <p>9 Q. All right. Do you have Exhibit Number 5 in</p> <p>10 front of you? What is labeled as a document Address</p> <p>11 History for Thomas E. Wells.</p> <p>12 A. Address History. Yes, it looks like I have</p> <p>13 it here.</p> <p>14 Q. Okay. Sir, do you see a date stamp in the</p> <p>15 top right corner of this document that says, "Received</p> <p>16 December 2, 2019"?</p> <p>17 A. "Received December 2, 2019", yes.</p> <p>18 Q. All right. And this is a two-page</p> <p>19 document; is that right?</p> <p>20 A. Yes.</p> <p>21 Q. Was this a record that was filled out by</p> <p>22 you, sir? Is that your handwriting?</p> <p>23 A. I think that's my handwriting.</p> <p>24 Q. All right. And in terms of the document</p> <p>25 itself, the printed section, address history, where</p>	<p style="text-align: right;">Page 40</p> <p>1 A. Okay.</p> <p>2 BY MR. DUERK:</p> <p>3 Q. Is this a document that you filled in? In</p> <p>4 other words, is this your handwriting on Exhibit 6?</p> <p>5 A. Well, I'm just a little hung up. There's</p> <p>6 12 months in a year.</p> <p>7 Q. Yes.</p> <p>8 A. Right? So 2019 is November -- is</p> <p>9 December 19?</p> <p>10 OFF-CAMERA SPEAKER: No, it's the year.</p> <p>11 He's asking you about the year.</p> <p>12 A. Huh?</p> <p>13 OFF-CAMERA SPEAKER: He's asking you to say</p> <p>14 okay, that you already read that. 2019 is just the</p> <p>15 year. It's 2019.</p> <p>16 A. Oh, 2019 is the year?</p> <p>17 OFF-CAMERA SPEAKER: Yes.</p> <p>18 A. All right. So in 2019 of last year.</p> <p>19 BY MR. DUERK:</p> <p>20 Q. Yes.</p> <p>21 A. Okay.</p> <p>22 Q. Does that appear to be the correct date</p> <p>23 when you filled this out, December of 2019?</p> <p>24 OFF-CAMERA SPEAKER: Last December.</p> <p>25 A. Okay.</p>
<p style="text-align: right;">Page 39</p> <p>1 did this document come from?</p> <p>2 A. I don't know. Jin's office maybe.</p> <p>3 Q. Okay. And did you fill out this document</p> <p>4 sometime on or about December of 2019 of this year?</p> <p>5 A. That could very well be, yes.</p> <p>6 Q. All right. And as you look through the</p> <p>7 information on this document, does this information</p> <p>8 appear to be true and accurate related to your address</p> <p>9 history?</p> <p>10 A. Well, I think so.</p> <p>11 Q. All right. If we could now turn to Exhibit</p> <p>12 6. This is a document that should be titled Work</p> <p>13 History. Do you see the Work History document in</p> <p>14 front of you?</p> <p>15 A. Yes, I do.</p> <p>16 Q. All right. Again, this document has your</p> <p>17 name on it in the top left-hand corner; is that right?</p> <p>18 A. Yep.</p> <p>19 Q. It is date stamped, "Received December 2,</p> <p>20 2019". Is that accurate?</p> <p>21 A. December the 2019. 2019. So that would</p> <p>22 have been November?</p> <p>23 Q. This would be December 2 of last year,</p> <p>24 2019.</p> <p>25 OFF-CAMERA SPEAKER: (Unintelligible.)</p>	<p style="text-align: right;">Page 41</p> <p>1 BY MR. DUERK:</p> <p>2 Q. Sir, do you see the handwritten portion of</p> <p>3 Exhibit 6?</p> <p>4 A. All right.</p> <p>5 OFF-CAMERA SPEAKER: Yes.</p> <p>6 A. 8-20.</p> <p>7 OFF-CAMERA SPEAKER: He's just asking if</p> <p>8 you see it there. Say yes.</p> <p>9 A. He is what?</p> <p>10 OFF-CAMERA SPEAKER: (Unintelligible.) He</p> <p>11 just asked you to confirm it.</p> <p>12 A. Okay.</p> <p>13 BY MR. DUERK:</p> <p>14 Q. Sir, my question is this. Is that your</p> <p>15 handwriting on this document?</p> <p>16 A. Yeah, I believe it is.</p> <p>17 Q. All right. And does this document</p> <p>18 accurately set forth your work history?</p> <p>19 A. It looks like it, yeah.</p> <p>20 Q. All right. Do you see the right-hand</p> <p>21 column, "Asbestos Exposure on Job"?</p> <p>22 A. Yes.</p> <p>23 Q. All right. For most of these entries, for</p> <p>24 Mount Vernon School District for Burlington Edison</p> <p>25 School District, for Colegio Albania, for Colegio</p>

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<p style="text-align: right;">Page 42</p> <p>1 Maya, for the U.S. Forest Service, and for the U.S. 2 Peace Corps in South Korea, you said that in terms of 3 asbestos exposure on the job, no, there was no 4 asbestos exposure on the job, to the best of your 5 knowledge. Is that fair? 6 A. Yes. 7 Q. All right. In terms of the next entries, 8 U.S. Forest Service, Kootenai; U.S. Forest Service, 9 Kootenai and Troy, for both of those entries, and then 10 the last jobs, various job -- part-times jobs in 11 Missoula, you also handwrote your responses to whether 12 or not there was asbestos exposure; is that right? 13 A. Yes. 14 Q. Okay. And for asbestos exposure while you 15 were working for the forest service, you said: 16 "Lived in Libby maybe, maybe, and maybe. 17 You visited Libby often." 18 Is that right? 19 A. Yeah. 20 Q. All right. In terms of the places that you 21 were living while you were working for the forest 22 service at -- during your direct examination, you 23 talked about living on the Bull River or nearby the 24 Bull River; is that right? 25 A. The what river?</p>	<p style="text-align: right;">Page 44</p> <p>1 Q. So just to be clear, when you were working 2 for the forest service, that happened during three 3 distinct -- well, it looks like four periods of time 4 you lived around that -- you lived in the Libby and 5 Troy area for the first time from June of 1976 until 6 November of 1976 at the Sylvanite Ranger Station; is 7 that correct? 8 A. In the greater Sylvanite, Libby, and Troy 9 area, yes. 10 Q. And you've submitted some photographs of 11 the area around the Sylvanite Ranger Station; is that 12 right? 13 A. Correct. 14 Q. And fair to say that the Sylvanite Ranger 15 Station is not in Libby, Montana; correct? 16 A. Correct. 17 Q. How many miles away from Libby, Montana is 18 the Sylvanite Ranger Station, if you could estimate 19 for me in terms of miles? 20 A. Well, I'm going to guess 15-ish. 21 Q. Okay. Then I believe during your direct 22 testimony, you estimated that you would go into town, 23 into Libby occasionally when you were working out of 24 the Sylvanite Ranger Station. 25 A. Yeah.</p>
<p style="text-align: right;">Page 43</p> <p>1 Q. You lived at the Bull River and -- when you 2 were living on Highway 2. 3 MS. MARIMAN: Objection. I think it 4 misstates his testimony. I think he testified that he 5 lived where Bull River Road intersected with Highway 6 2. 7 MR. DUERK: All right. 8 BY MR. DUERK: 9 Q. And, sir -- 10 A. Bull River, right. 11 Q. Right. And, sir, to the best of your 12 recollection, did the Bull River Road go along the 13 Bull River close to where you lived? 14 A. No. 15 Q. Okay. 16 A. It crossed it. 17 Q. Okay. 18 A. But we didn't parallel it for very long. I 19 mean, the Bull River -- Bull River Highway runs along 20 it for quite a ways, but that road -- 21 Q. All right. 22 A. -- was a ways off the Bull River Road. 23 Q. Okay. That may have been my mistake. I 24 apologize. 25 A. Okay.</p>	<p style="text-align: right;">Page 45</p> <p>1 Q. Did I hear that right? Okay. 2 There was another period of time when you 3 lived in the Libby area from June 1977 until 4 November 1977 when you lived off Highway 2; is that 5 correct? 6 A. Yeah. Let me check the dates. 7 Q. Sure. If it would help, I think you've got 8 Exhibit 1 in front of you, your residential history. 9 A. So '78? 10 Q. No. I'm sorry. June of 1977 until 11 November of 1977 I show your address as Highway 2, 12 Libby, Montana; correct? 13 A. Yep. 14 Q. All right. And we spoke a little bit about 15 that residence. Was that the timeframe when you lived 16 in a trailer? 17 A. Yeah. 18 Q. All right. And do you recall anything 19 about the particulars of that trailer in terms of the 20 flooring material in the trailer? 21 A. Not really, no. 22 Q. Do you recall if it had a tile floor? 23 A. I don't recall if it had a tile floor. 24 Q. Do you recall if any of the insulation in 25 that trailer was provided by the W.R. Grace Company?</p>

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<p style="text-align: right;">Page 46</p> <p>1 A. No.</p> <p>2 Q. Do you recall any vermiculite product in</p> <p>3 use in that trailer?</p> <p>4 A. I can't say that I recognize the presence</p> <p>5 of vermiculite in the trailer.</p> <p>6 Q. Okay. Do you recall any insulating</p> <p>7 wrapping tape being used in that trailer?</p> <p>8 A. No.</p> <p>9 Q. Okay. Do you recall whether that trailer</p> <p>10 or that trailer yard had any gravel in it?</p> <p>11 A. The yard at the trailer?</p> <p>12 Q. The yard or the driveway, sir.</p> <p>13 A. Yeah, there might have been gravel.</p> <p>14 Q. All right. You mentioned earlier that you</p> <p>15 had done some gardening when you were working --</p> <p>16 A. Yeah.</p> <p>17 Q. -- and living in the Libby area. Were you</p> <p>18 gardening -- have you been a gardener consistently</p> <p>19 through your life?</p> <p>20 A. Kind of, yeah.</p> <p>21 Q. Yeah. And what sorts of plants or flowers</p> <p>22 have you grown through the years?</p> <p>23 A. Carrots, spinach, radishes, all the early</p> <p>24 stuff, and then try to grow some corn, some peppers,</p> <p>25 squash. So those were the main biggies.</p>	<p style="text-align: right;">Page 48</p> <p>1 Montana --</p> <p>2 A. Yep.</p> <p>3 Q. -- from June of 1978 to November of '78; is</p> <p>4 that correct?</p> <p>5 A. Sounds right, yeah.</p> <p>6 Q. And that was the timeframe when you may</p> <p>7 have done some gardening with your ex-wife at that</p> <p>8 address; correct?</p> <p>9 A. Yeah, maybe a little bit.</p> <p>10 Q. In terms of that house, sir, do you recall</p> <p>11 any linoleum tiles or any other types of tiles inside</p> <p>12 the house?</p> <p>13 A. There probably was some linoleum. Just</p> <p>14 guessing the time period of the house.</p> <p>15 Q. Okay. Did you ever go into the attic or</p> <p>16 crawl space of that house in Libby at Second Street?</p> <p>17 A. No, I don't recall ever being in the crawl</p> <p>18 space.</p> <p>19 Q. Okay. Do you recall ever looking into the</p> <p>20 attic in that Second Street house in Libby?</p> <p>21 A. No.</p> <p>22 Q. Do you recall ever seeing vermiculite</p> <p>23 insulation in that Second Street Libby home?</p> <p>24 A. I don't recall it, no.</p> <p>25 Q. Okay. Do you recall ever seeing any type</p>
<p style="text-align: right;">Page 47</p> <p>1 Q. Okay. And were you gardening for each of</p> <p>2 the timeframes when you lived in the Libby area?</p> <p>3 A. We were gardening what?</p> <p>4 Q. Were you gardening during each of those</p> <p>5 timeframes when you lived in the Libby area?</p> <p>6 A. Yeah. I don't think so when we lived up at</p> <p>7 the station.</p> <p>8 Q. Right.</p> <p>9 A. Maybe. Maybe, and then when we lived out</p> <p>10 on -- in the house with the four -- three other guys,</p> <p>11 we may have tried a little bit there, but being all</p> <p>12 guys, it probably wasn't much of an effort.</p> <p>13 Q. Okay. What --</p> <p>14 A. And then the third year when I lived with</p> <p>15 my ex-wife, I think we probably gave it a little bit</p> <p>16 of an effort there, but once again with coming and</p> <p>17 going, it wasn't a major effort. I think watering got</p> <p>18 left out a bit and generally not very well cared for.</p> <p>19 Q. Okay. Let's talk about that third time</p> <p>20 living in the Libby area. Based on Exhibit 1, that</p> <p>21 timeframe would have been June 1978 until</p> <p>22 November 1978; is that correct?</p> <p>23 A. That's Exhibit 1? Is that what it says?</p> <p>24 Q. That's what it says here on Exhibit 1, that</p> <p>25 you were at the Second Street Extension in Libby,</p>	<p style="text-align: right;">Page 49</p> <p>1 of tape around any of the pipes in that Libby home?</p> <p>2 A. No.</p> <p>3 Q. Do you recall if the home had a gravel</p> <p>4 driveway?</p> <p>5 A. I don't recall, but it kind of seems like</p> <p>6 it did.</p> <p>7 Q. Okay.</p> <p>8 A. I can't say for sure on that.</p> <p>9 Q. Okay. Do you recall ever getting any type</p> <p>10 of products from -- from the local hardware store for</p> <p>11 the gardening that you did at that Second Street</p> <p>12 Extension?</p> <p>13 A. Maybe I said, you know, if -- if we did the</p> <p>14 gardening, which I kind of seem to remember muddling</p> <p>15 around with a little bit, we would have probably</p> <p>16 stopped by the hardware store and got some fertilizer.</p> <p>17 Q. Okay. In terms of the next episode where</p> <p>18 you lived in the Troy area, this would have occurred</p> <p>19 in 1981 after you returned from Korea, and I'm looking</p> <p>20 again on Exhibit 1.</p> <p>21 A. '71. No, '81. Yes.</p> <p>22 Q. '81 is what I have on this sheet, sir. I'm</p> <p>23 showing this --</p> <p>24 A. That's correct.</p> <p>25 Q. Okay. Thank you.</p>

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<p>1 A. That's correct.</p> <p>2 Q. I see August of 1981 until November of 1981</p> <p>3 you were at Bull Lake --</p> <p>4 A. Sounds about right.</p> <p>5 Q. And there you were at the Bull Lake Road</p> <p>6 house; is that correct?</p> <p>7 A. I was at the Bull -- lived at -- on the</p> <p>8 Bull Lake Road, yeah.</p> <p>9 Q. All right. And in terms of that house,</p> <p>10 what do you recall of that house? Two-story house,</p> <p>11 one-story house?</p> <p>12 A. I remember it was a one-story house, fairly</p> <p>13 new built, nice wood finish inside, and it had quite a</p> <p>14 bit of air.</p> <p>15 Q. Okay.</p> <p>16 A. It was -- it was new.</p> <p>17 Q. All right. So built close to 1981 or a</p> <p>18 little bit before. Fair?</p> <p>19 A. Yeah.</p> <p>20 Q. All right. Do you recall the kitchen or</p> <p>21 other floors of that house? Were there any tiles,</p> <p>22 linoleum or otherwise in that house?</p> <p>23 A. I remember wood and kind of a stair</p> <p>24 stepping down. As you went in, you kind of worked</p> <p>25 your way downstairs into sort of an open-design</p>	<p>1 Q. All right. Are you aware of any tape on</p> <p>2 any of the hot water pipes or any of the other pipes</p> <p>3 in the home?</p> <p>4 A. No, I'm not.</p> <p>5 Q. And you lived there for a period of</p> <p>6 approximately four months; is that correct?</p> <p>7 A. In '81 or '70?</p> <p>8 Q. In '81.</p> <p>9 A. This is the -- the Moss Creek.</p> <p>10 Q. Bull Lake Road house.</p> <p>11 A. Bull Lake, yes.</p> <p>12 Q. Do you know -- do you happen to remember</p> <p>13 the address of that house?</p> <p>14 A. No.</p> <p>15 Q. All right. Mr. Wells, my questions go to</p> <p>16 the house at Bull Lake and the other places that you</p> <p>17 lived in Libby. Okay?</p> <p>18 A. Okay.</p> <p>19 Q. Since 1981 have you been back to any of</p> <p>20 those residences?</p> <p>21 A. No.</p> <p>22 Q. Do you know if any of those residences,</p> <p>23 whether they are houses or the trailer, are still</p> <p>24 standing?</p> <p>25 A. I don't know that, no.</p>
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<p>1 kitchen and living room, dining room.</p> <p>2 (Court reporter interrupted.)</p> <p>3 (Discussion held off the record.)</p> <p>4 VIDEO TECHNICIAN: It is 3:30 p.m. We are</p> <p>5 going off record.</p> <p>6 (Break.)</p> <p>7 VIDEO TECHNICIAN: It is 3:36 p.m. and we</p> <p>8 are back on record.</p> <p>9 BY MR. DUERK:</p> <p>10 Q. Mr. Wells, can you hear me?</p> <p>11 A. Yes.</p> <p>12 Q. All right. Before we went off the record,</p> <p>13 we were talking about the house that you lived in on</p> <p>14 Bull Lake Road in Troy in 1980 --</p> <p>15 A. That was a house.</p> <p>16 Q. Right. And according to your testimony, it</p> <p>17 sounded like that was a fairly new house; correct?</p> <p>18 A. Yes.</p> <p>19 Q. So that was built sometime before you moved</p> <p>20 into it in 1981; correct?</p> <p>21 A. Correct.</p> <p>22 BY MR. DUERK:</p> <p>23 Q. In terms of that house, were you aware of</p> <p>24 whether there was vermiculite insulation in the attic?</p> <p>25 A. No, I'm not aware.</p>	<p>1 Q. Are you aware of whether any of those</p> <p>2 houses were abated for asbestos?</p> <p>3 A. I don't know that.</p> <p>4 Q. So fair to say that you're not aware of</p> <p>5 whether any of the places that you lived in the Libby</p> <p>6 area were abated for asbestos or torn down due to</p> <p>7 asbestos exposure?</p> <p>8 A. That's correct.</p> <p>9 Q. All right. You mentioned that occasionally</p> <p>10 you would spend time with friends when you were living</p> <p>11 in the Libby area; correct?</p> <p>12 A. Correct.</p> <p>13 Q. Do you recall if any of those friends</p> <p>14 worked for W.R. Grace?</p> <p>15 A. I don't believe so.</p> <p>16 Q. Did you spend time with any of those</p> <p>17 friends in their houses?</p> <p>18 A. I don't really remember going to anybody</p> <p>19 else's house. The main summer we would have been</p> <p>20 hanging out together, we were all sort of living</p> <p>21 together in the house on Second Street.</p> <p>22 Q. Okay.</p> <p>23 A. So if there was a gathering, it was usually</p> <p>24 at our house.</p> <p>25 Q. All right. You've said that you've been a</p>

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<p>1 runner during the course of your life. Were you doing 2 any jogging or running when you were living in the 3 Libby or Troy areas? 4 A. You know, I really didn't start the jogging 5 until I was probably in my early teaching days when I 6 got more focused on a physical health program, 7 maintaining one. 8 Q. Okay. Were you involved in any other 9 sports or recreational activities during the time that 10 you lived in Libby, such as volleyball, baseball, or 11 softball? 12 A. Played a lot of golf. 13 Q. Okay. 14 A. And I guess, you know, hiked. Hiked and 15 fished and hiked, but the golfing -- or the jogging 16 was more when I became settled in with kids and kind 17 of a routine lifestyle. 18 Q. Okay. In terms of some of your other 19 employment through the years, you have an interesting 20 employment and residential history when it comes to 21 the Peace Corps. 22 A. Yeah. 23 Q. It sounds like you were in the Peace Corps, 24 according to Exhibit 1, from April 1979 until July of 25 1981; is that correct?</p>	<p>1 meets the mountains. We could hike up into the 2 mountains easily from where we were. 3 Q. Were you living in -- were you living in a 4 house, a dormitory? What was the living 5 accommodation? 6 A. We were sharing a room with a family, so 7 they had a house with a spare room. 8 Q. Okay. And do you recall what the flooring 9 was made of? 10 A. The flooring? 11 Q. Yes. 12 A. Yeah. The flooring was made of charcoal. 13 Q. Okay. 14 A. And they have a system of heating the floor 15 called -- called ondol heating where the kitchen is a 16 few steps lower than the floor to the main room, and 17 you burn these round pieces of coal in these flumes 18 that flume out under the house. It's like -- the 19 heated flooring is basically what it is. 20 Q. All right. Then the next time that you 21 were on a -- I believe this is a Peace Corps detail -- 22 was August of 1983 until July of 1986 in Guatemala; is 23 that correct? 24 A. Well, we were teaching overseas, but it was 25 not in -- it was not in the Peace Corps.</p>
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<p>1 A. Yes. 2 Q. And where were you living in South Korea? 3 A. Well, I was mainly in the East Sea Region. 4 Gained some -- some famousness during the last winter 5 Olympics because they were -- the non-Alpine racing 6 events were held in the town I lived in, Gangneung. 7 Q. Okay. So you were in a mountainous section 8 of South Korea. Fair? 9 A. Well, Gangneung was actually down near the 10 coast. They could do all those things indoors. 11 Q. Okay. 12 A. But they hauled -- hauled them uphill and 13 depended heavily on manmade snow for the Alpine 14 events. 15 Q. All right. And what was your specific role 16 with the Peace Corps in South Korea? 17 A. I was a health care worker. 18 Q. What kinds of specific jobs did you 19 perform? 20 A. Tuberculosis, tracking down cases, 21 diagnosing them, and treating them. 22 Q. All right. What did you do recreationally 23 in South Korea during the years that you lived there? 24 A. Played frisbee. We hiked a lot. We were 25 up in the mountains. Well, we were where the sea</p>	<p>1 Q. Okay. And where in Guatemala were you 2 teaching during those years? 3 A. Yeah. We were living in Guatemala City, 4 but taught at a school outside of the city. We would 5 commute. 6 Q. Do you remember the name of the town? 7 A. Well, the school was in Colegio Maya. The 8 town, I don't even know if it had a name. It must 9 have had a little, like, colonial educational (sic) or 10 something. Some little marker to mark it as the 11 school area. 12 Q. Do you -- do you recall whether the streets 13 of that town were paved? 14 A. Sort of. 15 Q. Okay. Again -- 16 A. Parts were paved. Parts had been paved. 17 Parts were not paved. 18 Q. Okay. Do you recall whether that was a 19 mount -- a more mountainous region in Guatemala? 20 A. It was. 21 Q. All right. Mr. Wells, did you ever travel 22 to any of the volcanos in Guatemala while you were 23 there? 24 A. Yes. 25 Q. Okay. And could you see any of the</p>

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1 volcanos from the little town where you were teaching?
2 **A. Yes.**
3 Q. Is it fair to say that there's quite a bit
4 of volcanic terrain in Guatemala?
5 **A. Yes, there is.**
6 Q. In fact, there are over 25 volcanos in
7 Guatemala; correct?
8 **A. Correct.**
9 Q. To the best of your knowledge, the bulk of
10 those 20-plus volcanos are what are called
11 stratovolcanos or volcanos with a cinder cone; is that
12 right?
13 **A. Yes.**
14 Q. In the town where you were teaching in
15 Guatemala, was there agricultural -- were there
16 agricultural projects going on in that town?
17 **A. Yeah.**
18 Q. And did you participate in any of that
19 agricultural work in part?
20 **A. What?**
21 Q. Did you ever assist with any of those
22 agricultural activities in part?
23 **A. No.**
24 Q. Okay. And what subjects did you teach at
25 the little town in Guatemala?

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1 **A. Yeah, I taught math and sciences in high**
2 **school.**
3 Q. Okay. How did you get around in that
4 little town in Guatemala?
5 **A. Well, the first year we shuttled with**
6 **people or took the bus because the kids all came from**
7 **the city.**
8 Q. Yeah.
9 **A. So we could hitch a ride, but the second**
10 **and third years we had actually driven our car down so**
11 **we had our car down there.**
12 Q. Okay. Was it fairly hot in Guatemala when
13 you were there?
14 **A. It's not hot up at the school level. The**
15 **school was over 5,000 feet, but it was hot down in the**
16 **valley basin.**
17 Q. Okay. And would you drive with the windows
18 down when you were in Guatemala?
19 **A. Yes.**
20 Q. Okay. What was the dry season in Guatemala
21 when you were there?
22 **A. The drive?**
23 Q. I'm sorry. Was there a dry season when you
24 were in Guatemala?
25 **A. Oh, dry season. Yes, there was. Dry**

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1 **season -- let me get this straight. I have to**
2 **remember this. The dry season would begin in, like,**
3 **May, I think, and end in November.**
4 Q. All right. Did it ever get dusty in
5 Guatemala during that dry season?
6 **A. Yeah.**
7 Q. Okay. Fair to say that the building
8 materials in Guatemala at the time that you were
9 living there, a little bit different than those in the
10 United States. Fair?
11 **A. That's probably fair to say, yeah.**
12 Q. Okay. Not as common to find the same sorts
13 of windows and doors in Guatemala as we have here in
14 the United States. Also fair?
15 **A. Yeah, I'd say so.**
16 Q. Okay. So sealing out the elements, rain,
17 wind, and dust in Guatemala, more difficult to do that
18 there than here in the United States. Fair?
19 **A. I would say the standards were nowhere near**
20 **as high. The materials they brought in, I don't even**
21 **know.**
22 Q. Okay. Mr. Wells, do you happen to remember
23 any of the names of the volcanos that were around the
24 small town where you taught or Guatemala City?
25 **A. Yeah.**

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1 Q. What were the --
2 **A. There was Volcan de Agua, Fuego, so fire**
3 **and water, Acatenango. There were others. I'd have**
4 **to look them up.**
5 Q. Do you recall any of those volcanos
6 erupting while you were there?
7 **A. Once or twice small eruptions. Not any**
8 **major ones.**
9 Q. All right. But the soil where you were
10 living and working was volcanic soil in nature;
11 correct?
12 **A. Yes. Yes.**
13 Q. And the other place that you were teaching
14 was in Colombia in South America; correct?
15 **A. Uh-huh.**
16 Q. And that was from August of 1986 until June
17 of 1987; is that right?
18 **A. Sounds about right.**
19 Q. All right. And what were you teaching
20 while you were there?
21 **A. I was teaching elementary school math and**
22 **science and Lucy was teaching library.**
23 Q. Where were you living in Colombia? Do you
24 remember the name of the town?
25 **A. Colegio Albania.**

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<p>1 Q. And what was the nearest city to Colegio 2 Albania?</p> <p>3 A. Might have been Colegio Albania, although 4 that's the school name, but on the map I think it just 5 showed Albania.</p> <p>6 Q. Do you recall the type of living 7 arrangements there? Were you in a house or an 8 apartment?</p> <p>9 A. Dormitories. Well, little houses. They 10 were little concrete-constructed houses. Brand new.</p> <p>11 Q. Okay. Do you recall --</p> <p>12 A. It was a mine basically. 13 (Court reporter asked for clarification.)</p> <p>14 A. It was a mine.</p> <p>15 Q. Do you recall what was being mined from 16 that mining area?</p> <p>17 A. Copper.</p> <p>18 Q. Did you see any of the mining equipment 19 while you were living in that part of South America?</p> <p>20 A. Yeah.</p> <p>21 Q. Okay. And what mining equipment do you 22 recall seeing?</p> <p>23 A. Giant things. You know, those things with 24 the wheels that are five times a human's height and 25 mega things.</p>	<p>1 distinction?</p> <p>2 Q. No, I'm -- I have a different question. In 3 the area that you were living when you were living in 4 Colombia, was that also an area of volcanic soils?</p> <p>5 A. Not so much.</p> <p>6 Q. Okay.</p> <p>7 A. No.</p> <p>8 Q. Fair enough.</p> <p>9 A. It was out in the coastal area on the 10 northeast side of where the peninsula or where the 11 Isthmus of Panama joins.</p> <p>12 Q. Yeah. And, sir, during the years that you 13 lived in Colombia, did you live there during the dry 14 season?</p> <p>15 A. Yeah. I mean, we lived there ten out of 16 12 months.</p> <p>17 Q. And fair to say that during the dry season 18 in Colombia also, things were occasionally dusty when 19 you were living there close to the mine, correct?</p> <p>20 A. Yeah.</p> <p>21 Q. All right. I'm -- sir, your address and 22 residence list indicates that you've lived in 23 Washington State for many years now. Is that fair?</p> <p>24 A. Me?</p> <p>25 Q. Yes, sir.</p>
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<p>1 Q. Yep. Sir, do you recall visiting any of 2 Colombia's volcanos while you were there?</p> <p>3 A. I'm trying to think about that. We visited 4 some spectacular country, but -- it might have been 5 volcanos, but they weren't that distinctive shape that 6 just jumps out at you in Guatemala. So they might 7 have been composite volcanos.</p> <p>8 Q. Understood. And in -- 9 (Court reporter asked for clarification.)</p> <p>10 A. They may be composite volcanos rather than 11 shield volcanos.</p> <p>12 Q. And, sir, fair to say that you are familiar 13 with the distinction between stratovolcanos being 14 conical in nature with large eruptions and explosive 15 eruptions in nature versus shield volcanos which are 16 lower rounded volcanos which typically ooze lava?</p> <p>17 A. Right.</p> <p>18 Q. Is that a distinction that's familiar to 19 you?</p> <p>20 A. Yes.</p> <p>21 Q. All right. And, sir, when you were living 22 in Colombia, did you live in a region of volcanic 23 soils close to these mines or the mine that you lived 24 at?</p> <p>25 A. You're asking me if I was aware of the</p>	<p>1 A. Yeah, I've lived in Washington now for -- 2 well, I moved here in '87, so 34 years.</p> <p>3 Q. All right. And if I'm looking at some of 4 these photos correctly on Exhibit 3, the last page of 5 Tom Wells Washington Employment Locations, I see Bay 6 View Elementary, West View Elementary, and Mount Baker 7 Elementary schools. Are those all three schools where 8 you worked?</p> <p>9 A. What was the first one?</p> <p>10 Q. I'm sorry. Bay View Elementary.</p> <p>11 A. Well, no. The first one I taught at was 12 West View.</p> <p>13 Q. Okay.</p> <p>14 A. And then Mount Baker.</p> <p>15 Q. Okay.</p> <p>16 A. Well, no. Yeah, and then from West -- 17 well, I went to the -- what's the one up on Josh 18 Wilson?</p> <p>19 OFF-CAMERA SPEAKER: Bay View.</p> <p>20 A. Bay View?</p> <p>21 OFF-CAMERA SPEAKER: Yeah.</p> <p>22 A. So yeah, I did go to Bay View second, and 23 then I went to Mount Baker third.</p> <p>24 BY MR. DUERK:</p> <p>25 Q. Okay. And, sir, those three elementary</p>

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<p style="text-align: right;">Page 66</p> <p>1 schools are educational institutions or schools where 2 you taught for the better part of three decades; is 3 that right? 4 A. That's right. 5 Q. And all of those schools are close to Mount 6 Baker in the Pacific Northwest; is that correct? 7 A. That's true. 8 Q. And Mount Baker is itself one of the fire 9 mountains in the northwest or an old volcano; is that 10 right? 11 A. Yep. 12 Q. And could you see Mount Baker from each of 13 those locations? 14 A. Yeah. 15 Q. Okay. In terms of each of those school 16 buildings, those were all school buildings that were 17 built, in part, in the 1980s or earlier before 18 renovations; is that right? 19 A. No. Two -- two of them were built after, 20 one built before. 21 Q. Okay. Which one was the one that was built 22 before the 1980s? 23 A. That would have been West View. 24 Q. All right. And you worked at West View 25 Elementary from 1987 until 1992; correct?</p>	<p style="text-align: right;">Page 68</p> <p>1 A. I don't know what was under the tape. 2 Q. All right. In terms of the next place that 3 you worked, Bay View Elementary, now, it sounds like 4 Bay View Elementary was a slightly newer school; is 5 that right? 6 A. Yes. 7 Q. All right. In Bay View Elementary, do you 8 remember any tiles on the floor or any of the 9 insulating tape that were present at West View 10 Elementary? 11 A. No. 12 Q. Okay. Do you know if there were any 13 asbestos-containing materials used in the construction 14 of Bay View Elementary? 15 A. No. 16 Q. All right. Turning to -- 17 A. I assume not. 18 Q. Okay. Turning to Mount Baker Elementary. 19 A. Yes. 20 Q. Do you know if -- do you know if there are 21 any asbestos-containing materials used in Mount Baker 22 Elementary? 23 A. No, but I know that sometime in the 90s, I 24 think, regulations went in against asbestos. Now, 25 where that fell on the Mount Baker construction</p>
<p style="text-align: right;">Page 67</p> <p>1 A. Yes. 2 Q. West View Elementary during those years had 3 linoleum floors; correct? 4 A. If you say so. 5 Q. Well, I'm not the witness, sir. I -- so 6 if -- 7 A. I'm not an expert on flooring. 8 Q. That's okay. 9 A. I don't know. 10 Q. All right. Can you describe what the 11 flooring looked like? Was it made of tile? How about 12 we start there. 13 A. Yeah, it was just thin sheets, the way I 14 remember it. 15 Q. Okay. And do you remember any of the 16 heating pipes or water pipes in West View Elementary 17 being wrapped with any sort of tape? 18 A. Yeah, I kind of remember the boiler and the 19 pipes coming out of the boiling room as being heavily 20 wrapped in white tape. 21 Q. All right. 22 A. I do remember that. 23 Q. And -- okay. And do you know whether or 24 not West View Elementary was insulated with any type 25 of asbestos-containing insulation?</p>	<p style="text-align: right;">Page 69</p> <p>1 timeline, I don't know. 2 Q. Okay. Do you recall any abatement efforts 3 related to asbestos being performed at any of these 4 three schools in the Washington area? 5 A. I don't remember any while I was working 6 there. 7 Q. Okay. Sir, switching gears just briefly, 8 it sounds like you've been an avid outdoorsman all of 9 your life. Is that fair? 10 A. Yeah. 11 Q. You were talking about a back country trip 12 that you took into Utah and Nevada this past fall in 13 2019; correct? 14 A. Yeah. 15 Q. Have you spent any time in either Utah or 16 Nevada on back country trips before the trip you took 17 this past fall? 18 A. Yeah. I was down in that part of the 19 country in October of 2012, I believe that it was. 20 Q. Okay. Ever do any hiking or backpacking on 21 the back roads or trails of Utah or Nevada? 22 A. Well, yeah, I mean what I just referred to. 23 Q. Yeah. Aside from the trip this past fall, 24 what were -- what was the longest backcountry trip you 25 took into Utah? Let's start there.</p>

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<p>1 A. Well, Utah I went after I was divorced, 2 probably just three or four years ago -- three 3 probably, and that was a couple weeks. And then a 4 couple years before that I would have gone into -- to 5 Mesa Verde and a bunch of those ruins. That would 6 have been just -- no, that would have been before I 7 got divorced. 8 Q. All right. Fair to say to get to the Mesa 9 Verde ruins, you have to walk across fairly dusty 10 trails for some -- some distance? 11 A. Yep. 12 Q. Okay. And fair to say that in terms of the 13 other trips that you took in Utah, you, likewise, were 14 walking on either trails or unpaved roads for part of 15 the way? 16 A. Part of the way, yep. Some of that was 17 in -- a lot of that was in Colorado and New Mexico 18 also. 19 Q. Yep. Okay. Fair to say that you've driven 20 unpaved roads in Utah and Nevada to get to some of 21 those trailheads in the past a fair distance; correct? 22 A. Yes. 23 Q. Okay. And fair to say that you made some 24 of those drives on those unpaved roads with the 25 windows down; correct?</p>	<p>1 A. I wouldn't say I've done a lot of 2 backcountry here, no. Mostly it's been hike to a 3 trailhead, maybe an overnight out with a hike and come 4 back. 5 Q. Okay. Can you recall any of the places 6 where you have done that more frequently than others? 7 A. Well, let me think about this. Mount 8 Baker, Mount Saint Helens, Eastern -- I can't really 9 come up with any overnight camp-outs in Eastern 10 Washington. I used to do a little bit of camping out 11 near Spokane just because I had a grandfather who 12 lived over there. 13 Q. Okay. Spend any time on any of those high 14 desert roads outside Spokane, the unpaved roads? 15 A. Yeah, a couple of trips up right around 16 Spokane itself. 17 Q. Okay. 18 A. In the Spokane National Forest, I guess it 19 is. 20 Q. All right. Sir, during the time that you 21 were in Libby, I just want to clarify a few things. I 22 think I know the answers to these questions, but I 23 just want to verify them. You never worked for the 24 railroad in any capacity; correct? 25 A. Correct.</p>
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<p>1 A. Correct. 2 Q. Okay. So I'd like to talk about some of 3 the other states in the west where it sounds like you 4 spent some time. Did I hear correctly that you had 5 spent some time in the Dakotas, sir? 6 A. No. 7 Q. Okay. Have you ever been to either North 8 Dakota or South Dakota? 9 A. Just drove through South Dakota one time. 10 Q. Okay. On that trip were you on any back 11 roads or unpaved roads? 12 A. On the South Dakota trip? 13 Q. Yeah. 14 A. Paved. 15 Q. Okay. Have you spent any time in Wyoming, 16 sir? 17 A. Yeah, a little bit. Not much. 18 Q. Okay. Any backcountry trips in Wyoming? 19 A. Not really. Driven through it mostly. 20 Q. All right. Okay. Any backcountry trips in 21 Oregon? 22 A. Not really backcountry. 23 Q. Okay. What about your home state of 24 Washington? Have you ever spent any time taking any 25 back roads tours or backpacking Washington State?</p>	<p>1 Q. You never rode the train between Libby and 2 what's known as the loading facility for W.R. Grace 3 product; correct? 4 A. Correct. 5 Q. You didn't ever work in the Libby rail 6 yard; correct? 7 A. Correct. 8 Q. And you never walked the railroad tracks on 9 any sort of professional basis; correct? 10 A. Correct. 11 Q. And your residence in Libby that was 12 closest to the tracks -- 13 A. Yep. 14 Q. -- you would -- the trailer, you would walk 15 into town from that location; correct? 16 A. Correct. 17 Q. Okay. In terms of locomotives, you never 18 did any maintenance on locomotives themselves; 19 correct? 20 A. Correct. 21 Q. Sir, did you ever do any maintenance work 22 on your own vehicles? 23 A. Very little. 24 Q. What kind of maintenance work do you recall 25 doing on your own vehicles, either cars or trucks?</p>

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<p style="text-align: right;">Page 74</p> <p>1 A. Yeah. In the old days, oil change. I 2 don't know. I'd say that's probably about it -- 3 Q. Okay. Did you ever -- 4 A. -- as far as my skills went. 5 Q. Okay. Did you ever change out the brakes 6 on any of your vehicles? 7 A. No. That was a job I got into maybe once 8 and decided it was futile. 9 Q. What kind of vehicle did you get into a 10 brake job on, just out of curiosity? 11 A. Dodge Dart. 12 Q. What year was that roughly? 13 A. '65. 14 Q. And what about changing out those brake 15 shoes made that a futile effort? 16 A. No, like I say, oil is about the only thing 17 I ventured into, and that got to be more of a mess 18 than a clean-up after a while. 19 Q. That's fair enough. So did you do a brake 20 job on that Dodge -- Dodge Dart? 21 A. I don't think so, no. 22 Q. Okay. In terms of the residences that you 23 lived in Washington State, did any of those residences 24 have any asbestos-containing material in them, to the 25 best of your knowledge?</p>	<p style="text-align: right;">Page 76</p> <p>1 BY MR. DUERK: 2 Q. Mr. Wells, during your deposition 3 questioning today, it's appeared to me that you've 4 understood my questions and where you've needed 5 clarification about my questions, you've asked for 6 that clarification. Has that been your impression 7 also? 8 A. Yes, that's been my feeling. 9 Q. That's been mine as well. 10 MR. DUERK: Thank you very much for your 11 time today, Mr. Wells. I have no further questions 12 for you. 13 A. Okay. Well, thank you for your patience. 14 MS. MARIMAN: Dale or Nate, do you have any 15 questions of Mr. Wells? 16 MR. HUEY: This is Nathan Huey. I just 17 have a few questions. I'm not sure whether Dale has 18 any questions or not, but I guess I'll just go ahead 19 and go. 20 EXAMINATION BY MR. HUEY: 21 Q. Hello, Mr. Wells. My name, as I said, is 22 Nathan Huey and I represent Robinson Insulation 23 Company, and I just have a few quick questions. I 24 think. 25 First off, have you ever heard of Robinson</p>
<p style="text-align: right;">Page 75</p> <p>1 A. Not that I am aware of. 2 Q. Okay. Did you continue to garden through 3 the years when you were living in Washington State? 4 A. Yes. 5 Q. Did you ever go to the hardware store and 6 pick up any fertilizer or soil amendments as part of 7 those gardening projects? 8 A. Yes. 9 Q. Okay. Sir, what I'd like to do is take a 10 five-minute break, just review some of my notes to 11 make sure that I've covered everything adequately. Is 12 that okay with you? 13 A. Yeah. 14 Q. All right. 15 A. So what do we want to click? What do we 16 want to click on here? 17 VIDEO TECHNICIAN: So we're going on break. 18 Going off the record? 19 MR. DUERK: Yes. 20 VIDEO TECHNICIAN: The time is 4:15 p.m. 21 and we are off record. 22 (Break.) 23 VIDEO TECHNICIAN: It is 4:27 p.m. and we 24 are back on record. 25 MR. DUERK: Thank you.</p>	<p style="text-align: right;">Page 77</p> <p>1 Insulation Company before today? 2 A. No. 3 Q. Was that a no, sir? 4 A. That was a no. 5 Q. Okay. Thank you. 6 A. Yes. 7 Q. Have you ever heard of Zonolite? 8 A. I have heard of Zonolite, yeah. 9 Q. And what -- what have you heard about 10 Zonolite? 11 A. Well, I'm not even sure what capacity I've 12 heard it in. It seems like some kind of -- is it 13 something you, like, use around your yard? Some kind 14 of yard product to plug leaks or something. 15 Q. To plug leaks. Do you know whether you 16 ever used Zonolite in your yard? 17 A. I don't know. 18 Q. Do you know whether you ever used Zonolite 19 for gardening? 20 A. I suspect that could have been the case. 21 Q. Okay. And why do you suspect that you 22 possibly used Zonolite for gardening? 23 A. Well, because I just associate it with, 24 like, a box I'd have around my garage over on the -- 25 the shelf that has to do with landscaping and stuff.</p>

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<p>1 Q. Okay.</p> <p>2 A. But I could be wrong about that totally.</p> <p>3 Q. So but in your mind's eye you're picturing</p> <p>4 possibly a box of -- like, a cardboard box of</p> <p>5 Zonolite?</p> <p>6 A. Yep.</p> <p>7 Q. Do you have any recollection of what that</p> <p>8 substance looked like?</p> <p>9 A. Zonolite. I don't know. Is that the</p> <p>10 stuff that's little white -- little white tablets and</p> <p>11 you put them in a container and it takes the water</p> <p>12 out? No. That's vermiculite or -- no, it's not</p> <p>13 vermiculite. Yeah, I don't know. I don't know what</p> <p>14 it is.</p> <p>15 MR. HUEY: Okay. All right. That's all</p> <p>16 the questions I have. Thank you.</p> <p>17 A. Okay.</p> <p>18 MS. MARIMAN: Dale, do you have any</p> <p>19 questions? Dale, we can't hear you. Do you have any</p> <p>20 questions?</p> <p>21 MR. COCKRELL: Can you hear me?</p> <p>22 MS. MARIMAN: We can barely hear you now,</p> <p>23 Dale.</p> <p>24 MR. COCKRELL: I can ignore my questions.</p> <p>25 MS. MARIMAN: Okay. Should we proceed with</p>	<p>1 appreciate it.</p> <p>2 TELEPHONIC DEFENSE COUNSEL: Thank you,</p> <p>3 Mr. Wells.</p> <p>4 TELEPHONIC DEFENSE COUNSEL: Thank you, Mr.</p> <p>5 Wells.</p> <p>6 A. Okay. Well, I appreciate your -- I</p> <p>7 appreciate your willingness to cooperate in this</p> <p>8 matter and try to get it done as quickly as possible.</p> <p>9 MS. MARIMAN: Thanks, Tom.</p> <p>10 A. Okay.</p> <p>11 TELEPHONIC DEFENSE COUNSEL: Thank you.</p> <p>12 (Discussion held off the record.)</p> <p>13 VIDEO TECHNICIAN: This concludes the</p> <p>14 videotaped deposition of Thomas E. Wells. The time is</p> <p>15 4:35 p.m. and we are off the record.</p> <p>16 (Exhibit No's. 1-6 marked for</p> <p>17 identification.)</p> <p>18 (Whereupon, signature was not waived and</p> <p>19 the witness was excused.)</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
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<p>1 concluding the deposition then, Dale? Okay.</p> <p>2 TELEPHONIC DEFENSE COUNSEL: I saw a phone</p> <p>3 number hang up, so he may have left.</p> <p>4 MS. MARIMAN: Okay. I think he has his</p> <p>5 microphone on mute.</p> <p>6 FURTHER EXAMINATION BY MS. MARIMAN:</p> <p>7 Q. Tom, this is Jin again. I just have two</p> <p>8 specific items of clarification.</p> <p>9 First, when you were answering questions by</p> <p>10 Mr. Duerk about the two places you lived in Libby in</p> <p>11 1977 and 1978, I just want to clarify which one is the</p> <p>12 trailer and which one is the house so that we're clear</p> <p>13 on it. So is it your testimony that in 1977 you lived</p> <p>14 at a house with three other guys off of Highway 2; is</p> <p>15 that correct?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. And is it your testimony that in</p> <p>18 1978 you lived on Taylor off of Second Street</p> <p>19 Extension next to the rail yard with your soon-to-be-</p> <p>20 wife, Lucy; is that correct?</p> <p>21 A. Correct.</p> <p>22 MS. MARIMAN: I have no further questions.</p> <p>23 Thank you.</p> <p>24 I believe that concludes our deposition.</p> <p>25 Tom, thank you for your time today. We very much</p>	<p>1 CERTIFICATE</p> <p>2</p> <p>3 I, SUSAN L. LAW, Certified Shorthand</p> <p>4 Reporter and Certified Court Reporter, do hereby</p> <p>5 certify that there came before me telephonically,</p> <p>6</p> <p>7 THOMAS WELLS,</p> <p>8</p> <p>9 who was by me first duly sworn to testify to the truth</p> <p>10 and nothing but the truth of all knowledge touching</p> <p>11 and concerning the matters in controversy in cause;</p> <p>12 that the witness was thereupon carefully examined</p> <p>13 under oath and said examination was reduced to writing</p> <p>14 by me; and that this deposition is a true and correct</p> <p>15 record of the testimony given by the witness.</p> <p>16</p> <p>17 I further certify that I am neither attorney</p> <p>18 nor counsel for nor related nor employed by any of the</p> <p>19 parties to the action in which this deposition is</p> <p>20 taken; further, that I am not a relative or employee</p> <p>21 of any attorney or counsel employed by the parties</p> <p>22 hereto or financially interested in this action.</p> <p>23 IN WITNESS WHEREOF, I have hereunto</p> <p>24 subscribed my name this 31st day of March, 2020.</p> <p>25</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>SUSAN L. LAW, CSR, CCR</p>

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1 STATE OF _____)
2) SS.
3 COUNTY OF _____)
4

5 COMES NOW THE WITNESS, THOMAS WELLS, and
6 having read the foregoing transcript of the deposition
7 taken on the 25th day of March, 2020, acknowledges by
8 signature hereto that it is a true and accurate
9 transcript of the testimony given on the date
10 hereinabove mentioned.
11

12 _____
13 THOMAS WELLS
14

15 Subscribed to before me this _____ day of
16 _____, 2020.
17

18 _____
19 Notary Public
20

21 My commission expires:
22 _____
23

24 (THOMAS WELLS OUT-OF-STATE PERPETUATION DEPOSITION)
25 Thomas Wells v. BNSF Railway Company, et al.
Reporter: Susan L. Law, CSR/CCR
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